

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A  
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

Nos. 6:20-cv-00812-ADA  
6:20-cv-00813-ADA  
6:20-cv-00814-ADA  
6:20-cv-00815-ADA  
6:20-cv-00902-ADA  
6:20-cv-00903-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF SARAH G. HARTMAN IN SUPPORT OF  
WSOU INVESTMENTS, LLC D/B/A BRAZOS LICENSING AND  
DEVELOPMENT'S OPPOSITION TO JUNIPER NETWORKS, INC.'S  
MOTION TO TRANSFER VENUE UNDER 28 U.S.C. § 1404(a)**

I, Sarah G. Hartman, hereby declare as follows:

1. I have personal knowledge of the facts set forth in this declaration. I am competent to testify as to all matters stated, and I am not under any legal disability that would in any way preclude me from testifying.

2. I am a partner at the law firm of Brown Rudnick LLP and counsel of record for Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development in these cases.

3. The exhibits attached to this declaration may contain annotations and/or excerpts of the originals.

4. Attached hereto as Exhibit A is a true and correct copy of relevant portions of the transcript of the April 2, 2021 deposition of Juniper's Rule 30(b)(6) corporate representative, Arthur Martinez.

5. Attached hereto as Exhibit B is a true and correct copy of a Juniper's verified Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories, with Exhibit

A, dated March 12, 2021, which Juniper has designated HIGHLY CONFIDENTIAL-ATTORNEYS' EYES ONLY.

6. Attached hereto as Exhibit C is a true and correct copy of a Juniper's verified Objections and Responses to Plaintiff's First Set of Interrogatories dated January 20, 2021.

7. Attached hereto as Exhibit D is a true and correct screen capture of Google Maps (<https://www.google.com/maps>), showing directions to Futurewei Technologies, Inc.'s office in Austin, Texas, located at North Mopac Expressway #360, Austin, TX 78759, from the Waco Division Courthouse, showing a distance of 96.7 miles, retrieved on April 16, 2021.

8. Attached hereto as Exhibit E is a true and correct screen capture Google Maps (<https://www.google.com/maps>), showing directions to Newisys's office in Austin, Texas, located at 10814 Jollyville Road, Austin, TX 78759, from the Waco Division Courthouse, showing a distance of 94.7 miles, retrieved on April 16, 2021.

9. Attached hereto as Exhibit F is a true and correct screen capture of Google Maps (<https://www.google.com/maps>), showing directions to IBM's office in Austin, Texas, located at 11400 Burnet Road, Austin, TX 78758, from the Waco Division Courthouse, showing a distance of 93.6 miles, retrieved on April 16, 2021.

10. Attached hereto as Exhibit G is a true and correct screen capture of the "Careers" page of LinkedIn's website, located at <https://careers.linkedin.com/Locations>, and retrieved on April 22, 2021.

11. Attached hereto as Exhibit H is a true and correct copy of a set of publicly available webpages that indicate the geographical locations of certain inventors of patents asserted by Brazos against Juniper in the six lawsuits filed by Brazos. These webpages were retrieved on April 22, 2021.

12. Attached hereto as Exhibit I is a true and correct screen capture of Google Maps (<https://www.google.com/maps>) showing directions from Plano, Texas and Richardson, Texas to the Waco Division Courthouse, showing a distance of approximately 120 miles and 114 miles, respectively, retrieved on April 23, 2021.

13. Attached hereto as Exhibit J is a true and correct copy of data provided by Docket Navigator comparing the number of cases stayed pending IPRs by this Court and by the Northern District of California's Court from 2017 to present, downloaded from <https://search.docketnavigator.com/patent/search> on April 22, 2021.

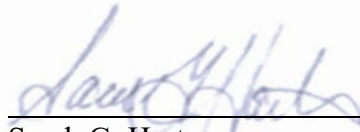
14. Attached hereto as Exhibit K is a true and correct copy of the publicly available data from the United States Courts website showing the National Judicial Caseload Profile for the 12-month period ending September 30, 2020, available at [https://www.uscourts.gov/sites/default/files/data\\_tables/fcms\\_na\\_distprofile0930.2020.pdf](https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0930.2020.pdf), retrieved on April 19, 2021.

15. Attached hereto as Exhibit L is a true and correct copy of Juniper's Second Supplemental Objections and Responses to Plaintiff's First Set of Interrogatories, dated April 22, 2021, which Juniper served to Brazos last night around 6:30 p.m. CT.

16. Attached hereto as Exhibit M are excerpts of the document entitled 45070\_JNPR\_00755422- "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" (Original file name: WSOU Accused Product\_04.21 (Q2'19-Q1'21) - CA & TX.xlsx), which Juniper designated "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY," and which it produced to Brazos last night, on April 22, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 23, 2021 in Los Angeles, California.

A handwritten signature in blue ink, appearing to read "Sarah G. Hartman", is written over a horizontal line.

Sarah G. Hartman